

Welfare-to-Work 15-Percent WtW Grant Administrative Review Guide

Prepared By
Compliance Review Division
August 2001

**15-PERCENT WELFARE TO WORK (WtW)
ADMINISTRATIVE REVIEW GUIDE**

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ADMINISTRATIVE REVIEW GUIDE

Background and Instructions

The purpose of our Administrative Review Guide is to provide the monitor with a basic understanding of the 15-Percent Grantees administrative policies and procedures including program administration, procurement administration, and fiscal administration. As stated in the confirmation letter, the Administrative Review Guide should facilitate a more efficient review.

Subgrantee staff responsible for completing the Administrative Review Guide may contact the monitor or his/her supervisor to clarify questions. In addition, please ensure that the individual(s) who complete the guide provide the following information at the end of each section of the guide: his/her name, telephone number, position/title, and date completed. If necessary, the monitor will contact the individual(s) who completed the guide to clarify responses.

Please provide your completed Administrative Review Guide to the monitor prior to or at the entrance conference.

The following block is to be completed by CRD staff, prior to mailing to the Subgrantee

Subgrantee: _____

Executive Director/Administrator: _____

Contact Person: _____ Phone _____

CRD Monitor: _____ Phone _____

CRD Supervisor: _____ Phone _____

I. PROGRAM ADMINISTRATION

A. GENERAL POLICIES AND PROCEDURES

1. How does the Subgrantee ensure that all worksites and training facilities for WtW participants meet health and safety standards established under state and federal law? Please provide a copy of the Subgrantee's policies and procedures. [20 CFR 645.260]

2. How are WtW participants informed of their right to file a complaint regarding violations of health and safety standards? [20 CFR 645.260(b) and 645.270(a)(2)]

3. How does the Subgrantee ensure that WtW participants in employment activities do not displace other employees? [20 CFR 645.265]

4. Describe the Subgrantee procedures to ensure that an individual placed in a WtW employment activity does not have an immediate family member in an administrative capacity for the employing agency. [20 CFR 645.230(j)]

B. GRIEVANCE PROCEDURES

Provide a copy of the Subgrantee WtW grievance policies and procedures.

1. Describe how the Subgrantee ensures compliance with nondiscrimination requirements. [20 CFR 645.255 and 645.425(b)(8); 29 CFR Part 37; WtW Directive WD99-7]

2. How does the Subgrantee inform its WtW participants and regular employees of its grievance procedures? [20 CFR 645.425(b), 645.270 and 645.265(d)]

C. MANAGEMENT INFORMATION SYSTEM (MIS) AND REPORTING

1. How does the Subgrantee ensure that WtW participants and activities are tracked and reported accurately? Please provide a copy of, or describe, the Subgrantee's procedures. [20 CFR 645.240]

2. What are the Subgrantee's procedures for the completion and submission of the required WtW program performance and fund expenditure reports to the Employment Development Department. [20 CFR 645.240]

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3. If applicable, how does the Subgrantee ensure that its service providers provide accurate and complete WtW financial and participant data on a timely basis?
[20 CFR 645.240]

D. OVERSIGHT/MONITORING

Provide a copy of the Subgrantee WtW monitoring policies and procedures. If the Subgrantee does not have any Subrecipients please skip to Section E.

1. Please provide a copy of, or describe, the Subgrantee's subrecipient oversight and monitoring policies, procedures, and tools.

2. Who performs the Subgrantee's WtW monitoring reviews and other oversight activities?

3. Does the Subgrantee's monitoring system (guide) address:

- ☐ Health and safety conditions for participants;
☐ Time attendance/payroll procedures for employers;
☐ Nondiscrimination
☐ Grievance procedures
☐ Employee displacement
☐ Other, please describe _____

E. AUDIT RESOLUTION

1. Describe the Subgrantee's system to respond to audit findings regarding contractor monitoring. Please provide a copy of, or describe, the Subgrantee's audit resolution policies and procedures. [20 CFR 645.230(b) & 645.255; WtW Directive WD01-4]

Subgrantee Staff
Completing Section I

Telephone

Position/Title

Date

II. PROCUREMENT

A. GENERAL POLICIES AND PROCEDURES

1. Please provide the name and telephone number of the designated procurement authority for the Subgrantee.

Name: _____

Telephone Number: _____

2. Does the Subgrantee have written policies and procedures for WtW procurements, that include the following:

[29 CFR 97.36(b)(1 and 3) and (c)(3); 29 CFR 95.44(a); WtW Directive WD01-3]

☐ A code of standards governing conflict of interests

☐ Selection procedures for procurement transactions

☐ Different types of procurement including when and how to use them

☐ Requirements for price or cost analysis, a process for resolving disputes, claims, and protest of awards

☐ Limited conditions under which a sole source procurement may occur

☐ Yes Please provide a copy.

☐ No Please describe the Subgrantee's procurement policies and procedures:

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3. Does the Subgrantee, if governmentally linked make any purchases through its central governmental supply house or procurement administration?

☐ Yes Please describe the types of purchases made in this manner:
☐ No

4. How does the Subgrantee ensure that no awards are made at any level to a party who is debarred or suspended or is otherwise excluded from participation in federal assistance programs? [20 CRF 645.230(g)]

5. Does the Subgrantee maintain a list(s) of pre-qualified persons, firms, or other organizations that are used in acquiring goods and services?

☐ Yes
☐ No

a) Identify the types of goods and services procured through the list(s).

b) Describe the criteria used to qualify for and update the pre-qualified list(s).

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6. Does the Subgrantee have a small purchase threshold different from that required by WtW Directive WD01-3?

☐ Yes If yes, please describe:
☐ No

B. PROPERTY MANAGEMENT

1. Please provide the name and phone number of the person who maintains the Subgrantee's property inventory.

Name: _____

Telephone: _____

2. Does the Subgrantee have written property management policies and procedures? [29 CFR 95.34(f) and 97.32(d)]

☐ Yes Please provide a copy.
☐ No Describe the Subgrantee's property management policies and procedures:

Subgrantee Staff
Completing Section II

Telephone

Position/Title

Date

III. FISCAL

A. ACCOUNTING SYSTEM OVERVIEW

1. Please provide the name and phone number of the Subgrantee's fiscal officer.

Name: _____

Telephone: _____

2. Does the subgrantee have written fiscal policies and procedures including a description of its fiscal accounting system used to track/control WtW funds? [29 CFR 97.20]

☐ Yes Please provide a copy of the Subgrantee's written policies and procedures.

☐ No Please explain:

3. What accounting report(s) is used to develop the subgrantee's quarterly expenditure report? [20 CFR 645.240]

4. Does the Subgrantee have a chart of accounts?

☐ Yes Please provide a copy of your chart of accounts.

☐ No Identify the accounting codes that the Subgrantee uses to track WtW funds by general eligibility, other eligibles, program year, appropriation, and cost category

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5. Who has final approval and authorizes payments for the following expenditures?
[20 CFR 645.230(a)]

Expenditures	Approves (Name/Title)	Authorizes (Name/Title)
Staff Salaries & Benefits		
Operation Costs		
Subrecipient Contractees		
Supportive Services		

6. Explain the Subgrantee's process for approving, authorizing, and posting WtW expenditures.

7. Please provide a copy of the Subgrantee's current organizational chart.

B. COST ALLOCATION AND COST POOLING

[OMB Circular A-87 Attachment C; OMB Circular A-122 Attachment A; and 20 CFR 645.230(C) & 645.235]

1. Please provide a copy of your cost allocation plan, or describe, your cost allocation system, which ensures that all costs are ultimately charged to a final cost objective in proportion to the relative benefit received by that cost objective.

For the following cost categories, please indicate the allocation basis, as applicable.

Costs	Basis for Allocating Costs
Rent	
Utilities	
Telephone	
Equipment	
Office Supplies	
Subrecipient Contracts	
Training Providers	
General Administration	

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2. Please identify all cost pools and the types of costs charged to each.

Cost Pools	Types of Costs Charged

C. INDIRECT COSTS

[OMB Circular A-87 Attachment E; OMB Circular A-122 Attachment A; 20 CFR 635 (d)(3)]

1. Does the Subgrantee incur indirect costs for services/benefits provided by others, i.e., County or City administrative support?
☐ Yes
☐ No Proceed to Section D.
2. Does the Subgrantee have an approved indirect cost rate (ICR) plan/methodology?
☐ Yes Please provide a copy of the Subgrantee's ICR.
☐ No
3. What types of costs does the Subgrantee incur as indirect costs?

D. CASH MANAGEMENT

1. Please explain the Subgrantee's cash management methodology.

[29 CFR Part 95.22 & 97.21; WtW Directives WD99-3 and WD99-11]

2. How is the Subgrantee's cash management methodology related to its planned benchmarks? [29 CFR Part 95.22 & 97.21; WtW Directives WD99-3 and WD99-11]

3. Does the Subgrantee earn interest income from its WtW funds?

[20 CFR 645.230(5)(6)]

☐ Yes

How does the Subgrantee identify and account for interest earned on WtW funds?

☐ No

E. PROGRAM INCOME

1. Does the Subgrantee generate program income? [20 CFR 645.230(5)(6)]

☐ Yes What types of program income does the Subgrantee generate?
☐ No Do not complete remaining questions.

2. How does the Subgrantee identify such income in the accounting records?
[WtW Directive WD01-8]

3. Does the Subgrantee expend its program income generated from WtW funds prior to requesting additional cash from the State? [29 CFR 97.21(f); 29 CFR 95.22(g)]

☐ Yes
☐ No Please explain:

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4. How does the Subgrantee ensure that program income generated from WtW funds is used to benefit WtW programs? [WtW Directive WD01-8]

**Subgrantee Staff
Completing Section III**

Telephone

Position/Title

Date